



International Bureau

Federal Communications Commission
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

August 1, 2002

RECEIVED

DEC - 4 2002

Federal Communications Commission
Office of the Secretary

Kenneth D. Patrich
Timothy J. Cooney
Wilkinson Barker Knauer, LLP
2300 N Street, NW
Suite 700
Washington, DC 20037

Re: Request for further information regarding transfer of certain Commission licenses from Bell Atlantic New Zealand Holdings, Inc. to Pacific Telecom Inc. IB Docket 02-111.

Dear Mr. Patrich and Mr. Cooney:

This is an information request regarding the petition for declaratory ruling and applications to transfer control of various Commission licenses and authorizations filed by you on behalf of Bell Atlantic New Zealand Holdings, Inc. ("BANZHI") and Pacific Telecom Inc. ("PTI"). In order for the Commission to complete its analysis and make the necessary public interest findings, as required under sections 214, 310(d) and 310(b)(4) of the Communications Act, as amended (the "Act"), additional information and clarification regarding the transaction is needed.

Accordingly, pursuant to sections 214 and 308(b) of the Act¹ and section 63.18 of the Commission's rules,² please provide written responses and supporting documentation for the questions set forth below, and, where appropriate, amend the applications and petition for declaratory ruling to reflect such responses.

1. A copy of the "Shareholders' Agreement" of PTI referred to on page 3 of the Petition for Declaratory Ruling under section 310(b)(4) of the Act.
2. An official copy of the final judicial determination of any criminal complaint filed against L&T International resulting from matter referred to in the July 17, 2002 letter from your firm to the Secretary of the Commission.
3. A copy of the Stock Purchase Agreement associated with PTI's proposed acquisition of Micronesian Telecommunications Corporation (of which BANZHI is the current 100 percent shareholder) and its subsidiary GTE Pacifica.

¹ 47 U.S.C. §§ 214, 308(b); *see also* 47 C.F.R. § 1.65.
² 47 C.F.R. § 63.18.

No. of Copies rec'd. 2
List ABOVE

4. A statement as to whether the Applicants have filed or intend to file materials associated with this transfer to the Committee on Foreign Investment in the United States (CFIUS).
5. Identification of the beneficiaries of each of the Tan Family Trusts, including their citizenship and entitlement, in percentage terms, under the relevant trust. Additionally, please provide information as to the ownership interest that each Tan Family Trust has in Tan Holdings Corp.
6. An explanation of the nature of the "affiliation" of Prospector with Citadel Holdings, inc., referred to on page 22 of the Opposition.
7. In connection with the discussion on pages 16-19 of the Opposition, filed by the Applicants, that states that the market will be fully competitive after the transaction, please state the market shares of the entities described and the transferor in the CNMI local and long distance markets as they are today and as they will be, including the transferee, immediately after the transaction closes.
8. Documentation (whether already existing or prepared in response to this request) establishing the acquisition cost associated with the cellular system located in the Northern Mariana Islands, call sign KNKN616.
9. A demonstration that PTI has the financial ability to acquire the cellular system licensed under call sign KNKN616 as required by section 22.937 of the Commission's rules, 47 C.F.R. § 22.937, and related Commission precedent.

Your responses should be filed with the Secretary, Federal Communications Commission and should reference IB Docket No. 02-111. Please also file courtesy copies of your response by email with Gardner Foster (gfoster@fcc.gov), David Strickland (dstrickl@fcc.gov), Neil Dellar (ndellar@fcc.gov), and John Branscome (jbransco@fcc.gov).

We would appreciate receiving your response no later than August 16, 2002.

Sincerely,



James L. Ball, Chief
Policy Division

cc: Peter D. Shields. Wiley Rein & Fielding. Counsel for BANZHI
Patrick W. Kelly. Deputy General Counsel. Federal Bureau of Investigation
John G. Malcolm. Deputy Assistant Attorney General. Criminal Division. United States Department of Justice
Thomas K. Crowe. Counsel for Governor of the Commonwealth of the Northern Mariana Islands
Diego M. Songao, Chairman Commonwealth of the Northern Mariana Islands Senate Committee on Public Utilities. Transportation and Communications
Rep. Gloria Dlc. Cabrera. Commonwealth of the Northern Mariana Islands House of Representatives
Rep. Stanley T. Torres, Commonwealth of the Northern Mariana Islands House of Representatives
Rep. Jesus T. Attao, Commonwealth of the Northern Mariana Islands House of Representatives
Rep. Benjamin B. Seaman, Commonwealth of the Northern Mariana Islands House of Representatives
Rep. Andrew S. Sala, Commonwealth of the Northern Mariana Islands House of Representatives
Rep. Joe P. Deleon Guerrero. Commonwealth of the Northern Mariana Islands House of Representatives
Anthony A. Das, PCI Communications